

MARQUIS AURBACH COFFING

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**Marquis Aurbach Coffing**

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*Attorneys for Defendants, LVMPD,  
Joseph Lombardo, John Pelletier, Richard Maupin,  
Ryan Fryman, Juan Contreras, Allen Pavese and  
Brandon Meads*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NEBYOU SOLOMON, an individual,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT; JOSEPH LOMBARDO,  
individually and in his official capacity as  
Sheriff; JOHN L. PELLETIER, an individual;  
RICHARD E. MAUPIN, an individual;  
RYAN J. FRYMAN, an individual; JUAN D.  
CONTRERAS, an individual; ALLEN J.  
PAVESE, an individual; BRANDON M.  
MEADS, an individual; FASHION SHOW  
MALL, LLC, a Nevada limited-liability  
company; UNIVERSAL PROTECTION  
SERVICE, LLC, a Nevada limited-liability  
company; ANDREW ANTONIO, an  
individual, EDUARDO AGUILAR, an  
individual, DOES I-V, individuals,

Defendants.

Case Number: 2:19-cv-00652-JAD-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(SIXTH REQUEST)**

Pursuant to Fed. R. Civ. P. 16(b)(4) and Local Rule 26-3, Defendants, the Las Vegas Metropolitan Police Department (the “Department” or “LVMPD”), Joseph Lombardo (“Lombardo”), John Pelletier (“Pelletier”), Richard Maupin (“Maupin”), Ryan Fryman (“Fryman”), Juan Contreras (“Contreras”), Allen Pavese (“Pavese”), and Brandon Meads (“Meads”) (collectively “LVMPD Defendants”), by and through their counsel of record,

Nick D. Crosby, Esq., of the law firm of Marquis Aurbach Coffing; and Plaintiff Nebyou Solomon ("Solomon"), by and through his counsel of record, Margaret A. McLetchie, Esq., Alina M. Shell, Esq. and Leo S. Wolpert, Esq., of the McLetchie Law firm, hereby stipulates and requests the Court to extend the discovery deadlines by fourteen (14) days as follows.

**I. DISCOVERY CUT-OFF DEADLINES**

	<b>Current Deadlines</b>	<b>Proposed Deadlines</b>
Discovery Cut-Off	June 23, 2021	July 7, 2021
Dispositive Motions	July 23, 2021	August 5, 2021
Pre-Trial Order	August 25, 2020	September 8, 2021

**II. REASON FOR REQUESTED EXTENSION**

This Stipulation is made in good faith and not for purposes of delay. Specifically, Defendants' counsel's time in recent weeks was predominantly occupied in the defense of an unfair labor practices trial before the National Labor Relations Board, followed by a subsequent 10(j) injunction proceeding in the same matter. As a result, counsel requested additional time to respond to written discovery propounded by Plaintiff, which Plaintiff's counsel obliged. As such, counsel will need more time to respond to the written discovery for Plaintiff's counsel to review, prior to depositions. The Parties agree they will require additional time to coordinate depositions, for which the Parties have discussed and are coordinating.

**III. CONCLUSION**

Based on the above, the Parties respectfully request that this Court extend the current deadlines by fourteen (14) days in order to allow the Parties adequate time to complete discovery and resolve any present conflicts.

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1 **IT IS SO STIPULATED.**

2 Dated this 28th day of May, 2021.

Dated this U28th day of May, 2021.

3 **MARQUIS AURBACH COFFING**

**MCLETCHIE LAW**

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5 By: /s/ Nick D. Crosby, Esq.

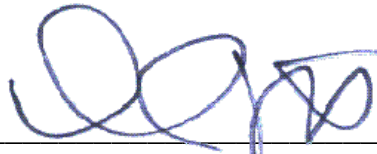
By: /s/ Alina M. Shell, Esq.

6 Nick D. Crosby, Esq.  
7 Nevada Bar No. 8996  
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9 Las Vegas, Nevada 89145  
10 *Attorneys for LVMPD Defendants*

Margaret A. McLetchie, Esq.  
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Alina M. Shell, Esq.  
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Leo S. Wolpert, Esq.  
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701 East Bridger Ave., Suite 520  
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*Attorneys for Plaintiff*

11 **ORDER**

12 **IT IS SO ORDERED:**

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15 DANIEL J. ALBREGTS  
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: June 2, 2021  
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## Suzanne Boggs

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**From:** Alina <Alina@nvlitigation.com>  
**Sent:** Friday, May 28, 2021 1:33 PM  
**To:** Nick Crosby; Maggie; Leo Wolpert  
**Cc:** Suzanne Boggs; Pharan  
**Subject:** RE: [External] SAO -- Solomon [IWOV-iManage.FID1081742]

Hi Nick:

Sorry for the slight delay. We are moving offices this weekend and it's been...busy. You have my authorization to affix my e-signature and file.

Thanks!

Alina

**Alina M. Shell**



**ATTORNEYS AT LAW**

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**From:** Nick Crosby <NCrosby@maclaw.com>  
**Sent:** Thursday, May 27, 2021 4:21 PM  
**To:** Alina <Alina@nvlitigation.com>; Maggie <maggie@nvlitigation.com>; Leo Wolpert <Leo@NVLITIGATION.COM>  
**Cc:** Suzanne Boggs <sboggs@maclaw.com>; Pharan <pharan@nvlitigation.com>  
**Subject:** SAO -- Solomon [IWOV-iManage.FID1081742]

Good Afternoon All – Attached is a draft SAO in this case. Please let me know if you have any changes, comments or questions.

Thanks!



**MARQUIS AURBACH  
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